Remarks

Claims 1, 2, 10-18, 21, 23-32, 40-49 are pending but stand rejected. Claims 3-9, 19, 20, 22, and 33-39 have been cancelled. In this response, Claims 1, 10, 12, 13, 17, 18, 26, 30, 31, 40, 42, 43, 47, and 48 have been amended. In view of the amendments and following remarks, the applicants respectfully ask for the Examiner's thoughtful reconsideration.

CLAIM REJECTIONS – 35 USC §103

Claims 1, 5, 31, 35, and 48 stand rejected under 35 U.S.C. §103 as being unpatentable over US Pub 2003/0065918 to Willey. It is initially noted that Claims 5 and 35 were cancelled and will not be addressed.

Claim 1 is directed to a method for publishing a PIN for use in establishing a pairing between a claimant device and a printing device and, as amended, recites the following:

1. the printing device detecting a local PIN request made by activation of a user interface control element provided by the printing device;
2. the printing device generating the PIN in response to the local PIN request and without communicating with the claimant device;
3. the printing device printing the PIN;
4. receiving a connection request from the claimant device, the connection request including PIN data assembled from the PIN; and
5. generating a link key using the PIN data, the link key used for device pairing between the claimant device and the printing device.

Claim 1 has been amended to clarify the phrase "local PIN request." In particular a local PIN request is made by activating a user interface control on a verifying device – in this case – a printing device. In response to that request the printing device generates a PIN. The printing device generates the PIN without communicating with a claimant device that is to be paired with the printing device.

Willey describes a method for pairing a telephone with a headset. *See*

Willey, Fig. 5a. A user initiates the pairing process via the user interface of the telephone. Willey, paragraph [0038]. In this case the telephone is a claimant device seeking to be paired with the headset –that is – the verifying device. The headset accepts the pairing request with or without confirmation. Willey, paragraph [0038]. The headset sends a confirmation signal to the telephone. Willey, paragraph [0039]. The telephone and the headset then exchange public keys. Willey, paragraph [0040]. The headset and the telephone use the keys to generate a shared secret. Willey, paragraph [0040]. That shared secret is used by each device to create a shared symmetric key. Willey, paragraph [0040]. Each device can then be converted to a decimal with a set number of least significant digits to generate a PIN. Willey, paragraph [0041]. To ensure the headset and the telephone have each generated the same PIN, the telephone displays the PIN on its user interface while the headset produces audible sounds for each digit. Willey, paragraph [0042].

To summarize, the generation of a PIN, according to Willey, is initiated by a claimant device (telephone) and requires the claimant device and the verifying device (headset) to exchange data allowing each device to simultaneously generate the same PIN. Thus, Willey's verifying device does **not** generate a PIN in response to a local PIN request and without communicating with the claimant device.

Consequently, Willey fails to teach or suggest a method that includes: (a) the printing device detecting a local PIN request made by activation of a user interface control element provided by the printing device and (b) the printing device generating the PIN in response to the local PIN request and without communicating with the claimant device. For at least this reason, Claim 1 is patentable over Willy as are Claims 2 and 10-12 which depend from Claim 1.

Claim 31 is directed to a system for publishing a PIN for use in establishing a pairing between a claimant device and a printing device and, as amended, recites components operable to implement the method of Claim 1. In

particular, Claim 31 recites a pin module that is operable to receive a local PIN request made by activating a user interface control element provided by a verifying device. The pin module is also operable to generate the PIN in response to the local PIN request and without communicating with a claimant device. As with Claim 1, Willey fails to teach or suggest generating a PIN in such a manner. For at least the same reasons Claim 1 is patentable, so are Claim 31 and Claims 32 and 40-42 which depend from Claim 31.

CLAIM REJECTIONS – 35 USC §103

Claims 2, 8, 10-12, 38, 40-42, and 48 stand rejected under 35 U.S.C. §103 as being unpatentable over Willey in view of US Pub 2003/0105963 to Slick. Claims 8 and 38 have been cancelled.

Claims 2 and 10-12 depend from Claim 1 and include all the limitations of that base Claim. For at least the same reasons Claim 1 is patentable, so are Claims 2 and 10-12.

Claims 40-42 depend from Claim 31 and include all the limitations of that base Claim. For at least the same reasons Claim 31 is patentable, so are Claims 40-42.

Claim 48 is directed to a system that includes various means for implementing the method of Claim 1. For at least the same reasons Claim 1 is patentable, so are Claims 48 and Claim 49 which depends from Claim 48.

CLAIM REJECTIONS – 35 USC §103

Claims 13, 23, 26, 30, 31, and 43 stand rejected under 35 U.S.C. §103 as being unpatentable over USPN 6,748,195 issued to Phillips.

Claim 13 is directed to a method for establishing a pairing between a

claimant device and a verifying device and recites the following:

1. detecting a local PIN request made by activation of a user interface control element provided by the verifying device;
2. generating a PIN in response to the local PIN request and without communicating with the claimant device;
3. instructing the verifying device to print the PIN;
4. receiving from the claimant device a connection request for the verifying device, the connection request including PIN data;
5. determining whether a link key exists for the verifying device;
6. if a link key exists:
    a. rejecting the connection request if the verifying device is not multi-claimant enabled;
    b. rejecting the connection request if the verifying device is multi-claimant enabled with restricted access and the claimant device is not approved;
7. otherwise, upon a determination that the PIN data is valid, generating a link key from the PIN data to establish a pairing between the claimant device and the verifying device.

As amended, Claim 13 – *not unlike Claim 1* – recites (a) detecting a local PIN request made by activation of a user interface control element provided by the verifying device and (b) generating a PIN in response to the local PIN request and without communicating with the claimant device. This is not taught or suggested by Phillips. .

Addressing Claim 13, the Examiner cites Phillips col. 5, lines 48-59 and col. 7, lines 3-17. These passages are reproduced below:

> The wireless device 12 operates under various modes. The operation modes of the wireless 12 device relate, among other things, to its discoverability, connectability, pairing, security, resource sharing, resource seeking, responding to other devices,

and idle modes. For example, the wireless device 12 can be either in a non-discoverable mode or in a discoverable mode. When the device 12 is in non-discoverable mode it does not respond to inquiries. After being made discoverable, the device 12 responds to the inquiries. Moreover, the device 12 can be either in non-connectable or in connectable modes under which it is set to respond or not to respond to paging messages. The wireless device 12 can be either in a non-pairable or pairable mode, when it accepts or does not creation of bonds initiated by another device. Under security modes, the wireless device uses authentication procedure when authentication is initiated by one device towards another, depending on if a link key exists and if pairing is allowed.

Phillips, col. 5, lines 48-65.

FIG. 6 is a table that defines exemplary profile parameters being associated with the profile A at the home location. At home, the wireless device **12** can be enabled to communicate with certain home devices, such as personal printer, personal computer, but not with neighboring devices, with low level security. FIG. 7 is a table that defines exemplary parameters being associated with the profile B at the office location, where the wireless device can be set to communicate with office printers, network devices, other computers, with moderate level security. However, when the wireless devices is out of the office, the device can be disabled to communicate with peer devices for security reasons and for conservation of resources, and other reasons. FIG. 8 is a table that defines exemplary parameters being associated with the profile C at the second location, which is everywhere else.

Phillips, col. 7, lines 3-18.

Phillips mentions nothing of a verifying device generating a PIN in response to the detection of a local PIN request made by activation of a user interface control element provided by the verifying device. Furthermore Phillips mentions nothing of generating a PIN without communicating with a claimant device.

For at least the same reasons Claim 1 is patentable, so are Claim 13 and Claim 15 which depends from Claim 13.

Claim 26 is directed to a computer readable medium having instructions for implementing the method of Claim 13. For at least the same reasons Claim

13 is patentable, so are Claim 26 and Claim 28 which depends from Claim 26.

Claim 30 is directed to a computer readable medium having instructions for implementing the method of Claim 17. For at least the same reasons Claim 17 is patentable (addressed below), so are Claim 30 and Claim 31 which depends from Claim 30.

Claim 43 is directed to a system having components for implementing the method of Claim 13. For at least the same reasons Claim 13 is patentable, so are Claim 43 and Claim 45 which depends from Claim 43.

CLAIM REJECTIONS – 35 USC §103

Claims 15-18, 21, 23, 25, 28-30, 32, 45-47 stand rejected under 35 U.S.C. §103 as being unpatentable over Phillips in view of Willey.

Claims 15 and 16 depend from Claim 13. For at least the same reasons Claim 13 is patentable, so are Claim 15 and 16.

Claim 17 recites a method that includes (a) detecting a local request to print a test page made by activation of a user interface control element provided by the printing device and (b) generating a PIN in response to the local request to print the test page and without communicating with the claimant device. As explained with respect to Claims 1 and 13 above, Phillips and Willey neither teach nor suggest generating a PIN in response to the detection of such a request or generating a PIN without communicating with the claimant device. For at least the same reasons Claims 1 and 13 are patentable, so is Claim 17.

Claim 18 is directed to a computer readable medium. The medium includes instructions for implementing the method of Claim 1. As explained with respect to Claims 1 and 13 above, Willey and Phillips fail to teach or suggest

detecting a local PIN request made by activation of a user interface control element provided by the printing device and generating the PIN in response to the local PIN request and without communicating with the claimant device. For at least the same reasons Claims 1 and 13 are patentable, so are Claim 18 and Claim 21 and Claims 23-25 which depend from Claim 18.

Claim 28 and 29 depend from Claim 26. For at least the same reasons Claim 26 is patentable, so are Claim 28 and 29.

Claim 30 is directed to a computer readable medium. That medium includes instructions for implementing the method of Claim 13. For at least the same reasons Claim 13 is patentable so are Claim 30.

Claim 32 depends from Claim 31, For at least the same reasons Claim 31 is patentable, so is Claim 32.

Claims 45 and 46 depend from Claim 43. For at least the same reasons Claim 43 is patentable, so are Claims 45 and 46.

Claim 47recites a system that includes various components configured to implement the method of Claim 17. For at least the same reasons Claim 17 is patentable, so is Claim 47.

Conclusion

In view of the foregoing remarks and amendments, Applicant respectfully submits that Claims 1, 2, 10-18, 21, 23-32, and 40-49 define allowable subject matter. The Examiner is requested to indicate the allowability of all claims in the application and to pass the application to issue.

Respectfully submitted,
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